From:	Robert.Neely
Reply To:	Robert.Neely@noaa.gov
To:	Eric Blischke/R10/USEPA/US@EPA
Subject:	[Fwd: Portland PRE]
Date:	03/20/2006 10:13 AM
Attachments:	Robert.Neely.vcf

FYI

-------- Original Message --------
Subject: Portland PRE
Date: Tue, 31 Jan 2006 10:57:47 -0800
From: Donald MacDonald <Donald.Macdonald@noaa.gov>
To: Robert Neely <Robert.Neely@noaa.gov>

Rob,

The PRE seems to be a very thorough preliminary evaluation and while I did not evaluate every number and assumption in detail (you wanted my comments before I retired) the various approaches used seems to be valid. As a result I only have one minor comment and I'll include it below rather than as an attachment.

In section 6.1.11 it gives chemicals that were excluded from the initial list of COPCs because "the HQs associated with these chemicals were low, and the uncertainty high . . ." The only one of these chemicals which the exclusion might be questioned based on the data is antimony. The antimony tissue residue HQ for the white sturgeon was 13.3. When you consider that an HQ of 1 is the standard break point for saying there is a potential hazard, an HQ of greater than an order of magnitude of this break point is not what I would call low. While the exclusion of antimony from the COPC list may be warranted it deserves a little more justification/explanation as to why it should be excluded. Examples: sediment and water data don't show elevations significantly above background; only a single tissue sample indicated a problem. If the elevated hazard quotient was the result of modeling then it could be explained by uncertainty but since it results from an actual tissue measurement it needs some explanation.

Don